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★ JUN 02 2017 ★

LONG ISLAND OFFICE

JJD:MEM
F. #2017R00764

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

SEAN LEONARD,
also known as "Phelps,"

Defendant.

- - - - - X

THE UNITED STATES ATTORNEY CHARGES:

SEYBERT, J.

LOCKE, M. J.

I N F O R M A T I O N

Cr. No. **CR-17 0294**

(T. 18, U.S.C., §§ 922(a)(1)(A),
924(a)(1)(D), 924(d)(1), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

ILLEGAL DEALING IN FIREARMS

1. In or about and between January 2015 and May 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SEAN LEONARD, also known as "Phelps," together with others, not being licensed importers, licensed manufacturers or licensed dealers in firearms, did knowingly and willfully engage in the business of dealing in firearms.

(Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code,

Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922.

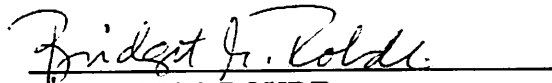
3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))


BRIDGET M. ROHDE
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK